

From: [Jamie Phillippe](#)
To: [Schaub, Mike](#)
Subject: RE: TR questions
Date: Friday, May 31, 2019 9:19:07 AM

Mike,

- 1) LDEQ will maintain use of the current copper ALC criteria methodology, with the BLM being an optional methodology for establishing site specific criteria. Third party data collection from facilities choosing the BLM option can be used until LDEQ has sufficient data to establish site specific criteria copper criteria with the BLM. Currently, LDEQ has no DOC data, which is a primary driver of the BLM model, and the agency is looking to collect data inputs relevant to the BLM.
- 2) In the recalculation of HHC, LDEQ changed: body weight from 70 kg to 80 kg, drinking water intake from 2.0 liters per day to 2.4 liters per day, and fish consumption from 20 grams per day to 30 grams per day. The 2015 EPA recommended health toxicity values for carcinogenic and non-carcinogenic pollutants were used, and the risk level for dioxin was increased from 10^{-5} to 10^{-6} . Additionally, if EPA had a drinking water or organoleptic MCL lower than the recalculated value, LDEQ used the lower of the two.
- 3) LDEQ will maintain use of the current cadmium ALC criteria methodology, with the correction to the equation. LDEQ efforts to adopt the 2016 cadmium methodology are ongoing.

Please let me know if you need anything else.

Thanks,
Jamie

From: Schaub, Mike <Schaub.Mike@epa.gov>
Sent: Thursday, May 30, 2019 5:57 PM
To: Jamie Phillippe <Jamie.Phillippe@LA.GOV>
Subject: TR questions

Hi Jamie,

I had a brief call with my HQs counterparts last week to discuss LA's TR. In that discussion, we came up with a few questions that we'd like to get your feedback on that will help us in our continued review. They are as follows:

1. In using the Biotic Ligand Model, can you clarify whether LDEQ intends to use a performance based approach, or site specific criteria approach, for copper? EPA generally recommends the latter. If it's the former, that's OK, but we'll have some additional recommendations to provide.
2. In re-calculating human health criteria, can you tell us what changed in your calculations? Was it the consumption rate?

3. It appears that nothing changed in the criteria equations for cadmium (except to remove the conversion factor from the exponent, which was the same thing done for lead). Are there no current plans to adopt the 2016 national criteria recommendations for cadmium?

That's it! Thanks a bunch!

Mike Schaub
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